

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

as modified
is ordered as the case management
scheduling order.

Discovery due Nov 3, 2004

Dispositive Motions due Dec 3, 2004

JANICE M. LAWRENCE,

Plaintiff,

v.

AVAYA INC.,

Defendant.

William L. Young
U.S. District Judge

May 4, 2004

CIVIL ACTION NO. 03-12610-WGY

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Pursuant to Fed R. Civ. P. 16, Local Rule 16.1 and this Court's Notice of Scheduling Conference dated April 16, 2004, Plaintiff Janice M. Lawrence ("Plaintiff") and Defendant Avaya Inc. ("Defendant") submit this Joint Statement. Counsel for the parties have conferred concerning all matters herein, and have agreed in full upon this Joint Statement.

I. Discovery and Motions Schedule

The parties propose the following discovery and motions schedule:

- A. Fed. R. Civ. P. 26(a)(1) initial disclosures by June 3, 2004 (1 month following the initial scheduling conference)
- B. Completion of discovery by November 3, 2004 (6 months following the initial scheduling conference);
- C. Motions pursuant to Fed. R. Civ. P. 56 filed by December 3, 2004 (1 month following the completion of discovery); and
- D. Pretrial conference within two months following the Court's resolution of any motions pursuant to Fed. R. Civ. P. 56.

II. Trial Before Magistrate Judge

Neither party consents at this time to a trial of this action before a Magistrate Judge.

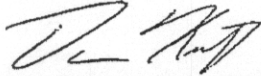
III. Local Rule 16.1(D)(3) Certifications

The parties' Local Rule 16.1(D)(3) Certifications will be filed separately.

Respectfully submitted,

AVAYA INC.,

By its attorneys,




Thomas E. Shirley (BBO # 542777)
David C. Kurtz (BBO #641380)
Lisa M. Gaulin (BBO # 645655)
Choate, Hall & Stewart
53 State Street
Boston, MA 02109
(617) 248-5000

Dated: April 28, 2004

JANICE M. LAWRENCE,

By her attorney,



Daniel W. Rice (BBO # 559269)
Glynn, Landry, Harrington & Rice LLP
10 Forbes Road
Braintree, MA 02184
(781) 849-8479